

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

ADVANCED CELLULAR SYSTEMS, CORP.

Plaintiff

Civil No. 97-2511 (JAF)

v.

PUERTO RICO TELEPHONE COMPANY;  
CELULARES TELEFONICA

Civil Action: Antitrust Laws;  
Discriminatory Pricing; Breach of Contract;  
Tort; Collection of Monies

Defendants

Jury Trial Demanded

**MOTION REQUESTING EXTENSION OF TIME TO FILE REPLY TO RESPONSE IN  
OPPOSITION TO ACS' REQUEST FOR AUTHORIZATION TO AMEND COMPLAINT**

TO THE HONORABLE COURT:

Comes now plaintiff Advanced Cellular Systems, Corp. ("ACS"), through the undersigned attorneys and respectfully states and prays as follows:

1. On January 3, 2007, Puerto Rico Telephone Company (PRTC) filed a response<sup>1</sup> in opposition to ACS' *Request for Authorization to Amend Complaint*.
2. In its opposition PRTC presents various arguments that must be properly addressed by ACS. Notwithstanding, the period of seven (7) days to file a reply to PRTC's Opposition expires today.
3. The appearing attorney for ACS received PRTC's response while away on vacation. Therefore, ACS needs more time to properly prepare its reply to PRTC's allegations.
4. Hence, ACS requests an extension of time of five (5) business days - to expire on January 23, 2007 - to present its reply to PRTC's response in opposition to ACS' *Request for Authorization to Amend the Complaint*.

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<sup>1</sup>Docket 44.

WHEREFORE, ACS respectfully requests that this Honorable Court grant it an extension of time of five (5) business days; to expire on January 23<sup>th</sup>, 2007, to file ACS' reply to PRTC's opposition to amend the original complaint.

I hereby certify that on January 16<sup>th</sup>, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Ricardo F. Casellas, Esq., Ricardo L. Ortiz Colón, Esq. and Mario Arroyo Dávila.

At San Juan, Puerto Rico, this 16<sup>th</sup> day of January 2007.

s/ Jairo Mellado-Villarreal  
Jairo Mellado-Villarreal, 208112  
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